



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

MAY 23 2011

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

John R. French, Ph. D. Arch Chemicals, Inc. 5660 New Northside Drive, Suite 100 Atlanta, GA 30328

**FILE COPY** 

Subject:

AW30

EPA Reg. No. 1258-1338

Application Dated: April 28, 2011 Receipt Date: April 29, 2011

Dear Dr. French:

The following notification submitted in connection with registration under the provisions of PR Notice 98-10, Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)9 is acceptable.

#### **Proposed Notification:**

Label change to revise Container Disposal language

#### **General Comments:**

The Child Resistant Packaging (CRP) information is being reviewed and a separate response letter will be mailed with the results.

Based on a review of the material submitted, the following comments apply:

This application for notification is acceptable, based on the information referenced above. A copy has been placed in our records for future reference.

Should you have any questions or comments concerning this letter, please contact me at Henson.Wanda@epa,gov or call (703) 308-6345.

Sincerely,

Wanda Henson

Acting Product Manager (32)

Regulatory Management Branch II

Antimicrobials Division (7510P)

Please read instructions on reverse before completing to	rm.	Form App	roved. OMB No.	2070-0060	Approvel expires 2-28-95	
Environmental Protection Agent Washington, DC 20460		ncy	→ agistr Amend ✓ Other		OPP Identifier Number	
Application for Pesticide - Section I						
1. Company/Product Number 1258-1338		2. EPA Product Manager 3. W. Henson			posed Classification  None Restricted	
4. Company/Product (Name) AW30		PM# 32			Trond I Troubled	
5. Name and Address of Applicant (Include ZIP Code)  Arch Chemicals, Inc.  Suite 1100, 5660 New Northside Drive  Atlanta, GA 30328  Check if this is a new address		6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No.				
CHECK II WIIS IS & HEW GUUISS	Product Name					
Section - II						
Amendment - Explain below.  Resubmission in response to Agency letter dated  Notification - Explain below.	Final printed labels in repsonse to April 19, 2011  — Me Too" Application.  Other - Explain below.					
Explanation: Use additional page(s) if necessary. (For section I and Section II.)  Notification of label text and child resistant packaging.  This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 10 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.						
	Sect	ion - III		<del></del>		
1. Material This Product Will Be Packaged In:						
" Certification must Unit Packaging wgt. con	Packaging Unit Packaging Water  Yes  ✓ No  If "Yes" No. per If "Yes"		No G		ontainer Metal Plastic Glass Paper Other (Specify)	
be submitted						
3. Location of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions    Label					33	
6. Menner in Which Lebel is Affixed to Product  Lithograph Paper glued Stenciled						
Section - IV						
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this epplication.)						
Name Title John R. French, Ph.D. Seni		J.			No. (Include Area Code) 226	
Certification  I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.  I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or (Stamped)						
2. Signature Sherch				( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (	
4. Typed Name 5		Date			<b>(</b>	
John R. French, Ph.D.	AR	pril 28, 20	9/1		(	

Arch Chemicals, Inc. Suite 1100 5660 New Northside Drive Atlanta, GA 30328 Phone: 678-627-2000

FAX: 678-627-2081



April 28, 2011

Ms. Wanda Henson (PM-32)
Office of Pesticide Programs (7504P)
C/O Document Processing Desk (NOTIF)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject:

AW30 (EPA Reg. No. 1258-1338)

Notification of labeling and child resistant packaging items

Dear Ms. Henson:

This correspondence constitutes our notification to the Agency to respond to certain conditions as stipulated in the registration certificate. Whereas we have acquiesced to most of the Agency's changes, we herewith respond to the following points as they were numbered on the certificate:

4 and 5 (non-refillable and refillable containers). The container disposal text that was suggested by the Agency pertains to products in large containers that are used by commercial applicators, however it is not correct for small container sizes for residential and consumer utility. In accordance with prior guidance from the Agency on the proper disposal text to include on our labels, we would use the Agency's indicated text on large package non-residential use products, but would use the disposal text that we originally proposed for small-package consumer and residential type products.

15 (child resistant packaging). The CRP certification statement dated February 9, 2011, which we provided to the Agency in context of applying for the registration, fully meets the statutory CRP certification requirement as described in 40 CFR 157.34. It is our position that the Agency's letter dated April 7, 2011, is requesting information over and above that which is required in order to meet the statutory requirement. Nevertheless, in an effort to fulfill the agency's request, attached please find listings from our container suppliers that describe in detail the exact types of containers that we would use to distribute products under this registration. These listings therefore should satisfy the Agency's requirements as stated on the registration certificate and in the Feb. 9, 2011 letter to package and distribute products described by this registration in container sizes less than 50 pounds.

Attached please find the final master label that covers all products that we intend to distribute under this registration. Please reply to this notification with a date-stamp on this letter and attached correspondence in order to comply with requests from state agencies.

Please feel free to contact me at any time, either by telephone (direct: 678-627-2226) or by e-mail (JRFrench@archchemicals.com) with regard to this action.

Sincerely,

John R. French, Ph.D. Senior Regulatory Manager

R. Theal

[Items in brackets [AAA] are optional and may/may not be included on final label]

{Items in braces {AAA} are for information purposes and will not appear on final label}

# **AW30**

**ACTIVE INGREDIENTS:** 

Trichloro-s-Triazinetrione	93.6%
Zinc sulfate monohydrate	3.5%
OTHER INGREDIENTS:	2.9%
TOTAL:	100.0%

(Available chlorine 84%)

KEEP OUT OF REACH OF CHILDREN

#### **DANGER**

# PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER: Corrosive.** Causes irreversible eye damage. Causes eye and skin burns. May be fatal if inhaled or absorbed through skin. Harmful if swallowed. Irritating to nose and throat.

- Open in a well ventilated area. Avoid breathing dust and fumes.
- Do not get in eyes, on skin or on clothing. Wear goggles and rubber gloves. For additional protection of skin, wear long sleeves and long pants.
- Wash hands after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove contaminated clothing and wash clothing before reuse.

Read all precautionary statements on [side] [back] label and all first aid statements before use.

FIRST AID: {required on front panel}

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING**: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the เชื้อ of gastric lavage.

IN CASE OF EMERGENCY CALL: 1-800-654-6911

*cecie* 

#### PHYSICAL AND CHEMICAL HAZARDS:

DANGER. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gas and spatter. Do not add water to this product. Add only into water.

- IDo not mix this product with a small amount of water. Only add this product directly to your pool.] {This statement will appear on Pool use labels only.}
- Do not allow to become wet or damp before use.

Can react with other materials, including other water treatment products, to cause fire, explosion, and the release of toxic gases.

- Keep all foreign matter, including other water treatment products, away from this product.
- Use only clean and dry utensils to dispense this product.
- Do not allow this product to contact other water treatment products. If used in a skimmer. make sure skimmer is completely clean and free of residue from other water treatment products before putting this product in a skimmer.
- Avoid spilling this product.

Exposure to heat can cause this product to rapidly decompose, leading to fire, explosion, and the release of toxic gases.

Store in a cool, dry, well ventilated area away from heat or open flame.

Strong oxidizing agent. This product can increase fire intensity.

Keep away from heat and from flame and burning material (like a lighted cigarette).

Contamination or improper use may cause fire, explosion or the release of toxic gases. Do not allow product to contact any foreign matter, including other water treatment products. If product is exposed to small amounts of water, it can react violently to produce heat and toxic gases and spatter. Do not add water to this product. Add only into water. {Optional - for use on residential use swimming pool products} [Do not remove floater or other dispensing device from water for an extended period of time if it contains a tablet or tablet residue] {The following optional statement is for use on residential use swimming pool and spa products.} [Do not mix this product with a small amount of water. Only add directly to your pool.] Corrosive. Causes irreversible eye damage and skin burns. Harmful if swallowed, inhaled, or absorbed through the skin.

First sentence of paragraph below for containers 50 lb. or less; complete paragraph for all other sizes}

#### **ENVIRONMENTAL HAZARDS:**

This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

{Household/residential use products}

#### **ISTORAGE AND DISPOSAL**

{Nonrefillable containers}

[Keep this product dry in its tightly closed container when not in use. Store in a gool, dry, wellventilated area. Keep away from heat or open flame. Nonrefillable container. Do not reuse or

.....

refill this container. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. If not, discard in trash. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING.]

# {Refillable containers}

[Keep this product dry in its tightly closed container when not in use. Store in a cool, dry, well-ventilated area. Keep away from heat or open flame. Do not contaminate food or feed by storage or disposal or cleaning of equipment. FOR DISPOSAL OF A CONTAMINATED OR DECOMPOSING PRODUCT SEE EMERGENCY HANDLING. Refillable container. Refill this container with Trichloro-s-Triazinetrione and zinc sulfate monohydrate only. Do not use this container for any other purpose. Rinse empty container thoroughly with water to dissolve all material prior to disposal. Offer for recycling if available. If not, discard in trash.]]

{Non-residential/non-household use products}

#### **ISTORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage:** Keep product in its tightly closed container when not in use in an area inaccessible to persons unfamiliar with its use. Store in cool, dry, well-ventilated area. Keep away from heat or open flame.

**Pesticide Disposal:** Pesticide waste is acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at your nearest EPA regional office for guidance.

#### **Container Disposal:**

#### {Nonrefillable containers}

Nonrefillable Container. Do not reuse this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a tank mix. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then, offer for recycling if available. If not, dispose of in a sanitary landfill or by procedures approved by state and local authorities.

# {Refillable containers}

Refillable Container. Refill this container with this Trichloro-s-triazinetrione and zinc sulfate monohydrate only. Do not use this container for any other purpose. Cleaning this container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rins ate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities. Then, offer for recycling if available, if not, dispose of in a sanitary landfill or by procedures approved by state and local authorities.]

. . . . . .

**EMERGENCY HANDLING:** In case of contamination or decomposition – Do not reseal container. Immediately remove container to an open and well-ventilated outdoor area by itself. Flood with large amounts of water. Dispose of the container and any remaining contaminated material in an approved landfill area.

[Manufactured for] {or} [Sold by]: Arch Chemicals, Inc. P.O. Box 723547 Atlanta, GA 31139-3547

EPA Reg. No.	1258
NET WEIGHT:	

EPA Est. No. XXXX-YY-ZZ

#### **DIRECTIONS FOR USE:**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[AW30 or other brand] [tablets\*] are a unique and effective pool water sanitizer.] [Routine sanitization is important to keep your pool water free of bacteria and contaminants.] [These convenient and easy to use [BRAND] [chlorinating] [tablets\*] are formulated to protect against chlorine loss in direct sunlight, and can be used in skimmers, [and] floaters [and feeders]. [In addition to sanitizing, [brand] [tablets] prevent algae growth and clarify your pool water.] [They are designed to dissolve slowly to provide a steady source of available chlorine.]

[For crystal clear pool water, follow our 4 step pool care program: Step 1: Test and balance pool water, Step 2: Sanitize, Step 3: Shock at least once a week, and Step 4: Add algaecide as directed by that product.]

**METHOD OF APPLICATION:** Use in a floating dispenser, automatic chlorinator, or feeder designed for this product, or place in skimmer. Use in a new chlorinating device or any device which has previously contained only this product or trichloro-s-triazinetrione. If placed in the skimmer, run the pump a minimum of eight hours daily. **DO NOT** Use in floaters or feeders that have been used with other water treatment products. **DO NOT** Throw tablets directly into pool. **DO NOT** permit tablets to contact plastic pool linings or metal objects. **DO NOT** Use in any chlorinating device which has been used with other chlorinating compounds.

#### **WATER BALANCE:**

[To provide optimum product performance, swimmer comfort and crystal clear water always maintain pH from 7.2 to 7.6, total alkalinity from 80 to 120 parts per million (ppm), and calcium hardness above 200 ppm. Test frequently using an HTH test kit that measures all these ranges. Make any necessary adjustments promptly with the appropriate HTH pool care products. Reentry into treated pools is prohibited with chlorine levels above 4 ppm for risk of bodily injury.] {or}

[Adjust and maintain pool water pH from 7.2 to 7.6, total alkalinity from 80 to 120 parts per million (ppm) and calcium hardness above 200 ppm. Test frequently using a [n] [prand] [test kit] [or] [test strips] that measure[s] all of the above ranges. [Bring a pool water sample to your librand] dealer frequently to test for water balance.] Maintain free available chlorine between 4-4 ppm [using a stabilized chlorine product] {or} [brand granular shock].

4

<sup>1 \*</sup>The term "tablet[s]" may be replaced with "stick[s]", "capsule[s]", "cube[s]", "cartridge[s]", or other descriptive term, either singular or plural, according to each respective product design.